

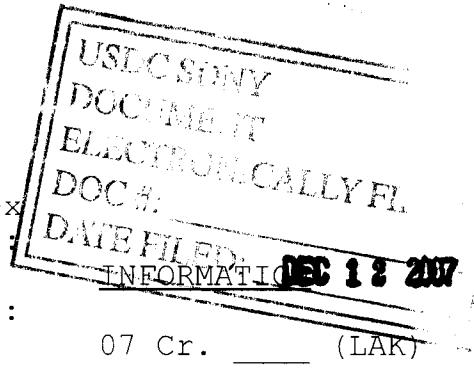
JUDGE KAPLAN
 UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----x
 UNITED STATES OF AMERICA

-v.-

OSCAR ROBLES-GONZALEZ,

Defendant.



07 Cr. _____ (LAK)

COUNT ONE

The United States Attorney Charges:

1. From at least in or about September 2007, up to and including on or about October 29, 2007, in the Southern District of New York and elsewhere, OSCAR ROBLES-GONZALEZ, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that OSCAR ROBLES-GONZALEZ, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A).

07 Cr. 1139

3. It was further a part and an object of the conspiracy that OSCAR ROBLES-GONZALEZ, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A).

OVERT ACT

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about October 29, 2007, OSCAR ROBLES-GONZALEZ, the defendant, carried approximately five kilograms of cocaine and approximately two kilograms of heroin on a bus from El Paso, Texas destined for New York, New York.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Information, OSCAR ROBLES-GONZALEZ, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the narcotics trafficking offense, and

any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Count One of this Information, including but not limited to the following:

a. A sum of money in United States currency representing the amount of proceeds obtained as a result of the offense alleged in Count One of this Information.

Substitute Assets Provision

6. If any of the above-described forfeitable property, as a results of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)



MICHAEL J. GARCIA
United States Attorney

